

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; STATE OF
NEW YORK; STATE OF HAWAII; STATE
OF ARIZONA; STATE OF CALIFORNIA;
STATE OF COLORADO; STATE OF
CONNECTICUT; STATE OF DELAWARE;
STATE OF ILLINOIS; STATE OF MAINE;
STATE OF MARYLAND;
COMMONWEALTH OF MASSACHUSETTS;
PEOPLE OF THE STATE OF MICHIGAN;
STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE
OF NEW MEXICO; STATE OF OREGON;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; INSTITUTE OF
MUSEUM AND LIBRARY SERVICES;
KEITH E. SONDERLING, in his official
capacity as Acting Director of the Institute of
Museum and Library Services; MINORITY
BUSINESS AND DEVELOPMENT AGENCY;
MADIHA D. LATIF, in her official capacity as
Deputy Under Secretary of Commerce for
Minority Business Development; HOWARD
LUTNICK, in his official capacity as Secretary
of Commerce; FEDERAL MEDIATION AND
CONCILIATION SERVICE; GREGORY
GOLDSTEIN, in his official capacity as Acting
Director of the Federal Mediation and
Conciliation Service; OFFICE OF
MANAGEMENT AND BUDGET; RUSSELL
T. VOUGHT, in his official capacity as Director
of the Office of Management and Budget;

Defendants.

Case No.: 1:25-cv-128

**PLAINTIFF STATES' NOTICE OF
SUPPLEMENTAL AUTHORITY IN
SUPPORT OF THEIR MOTION FOR
PRELIMINARY INJUNCTION**

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Plaintiff States submit the following supplemental authority in support of their Motion for Preliminary Injunction (ECF No. 3).

On May 1, 2025, the District Court for the District of Columbia granted in part plaintiffs' motion for a temporary restraining order (TRO) preventing the defendants from taking additional steps to close the Institute of Museum and Library Sciences (IMLS) pursuant to Executive Order 14238, "Continuing the Reduction of the Federal Bureaucracy"—the executive order at issue in this case. *Am. Library Ass'n, v. Sonderling*, No. CV 25-1050 (RJL), 2025 WL 1262054, --- F. Supp. 3d --- at *2 (D.D.C. May 1, 2025) (a copy of the opinion is attached as Exhibit 1). The court concluded that the termination of the agency "appeare[d] to violate . . . clear statutory mandates" and "contravene[d] Congress's appropriation of almost \$300 million to IMLS"; that it inflicted irreparable injury by "forc[ing] libraries to end programs midstream, fire employees, and in some cases, completely shutter"; and that the balance of the equities and public interest favored entry of a TRO. Ex. 1 at 3-5. Although plaintiffs had initially requested a preliminary injunction, at oral argument they converted that motion to a request for a TRO in light of "imminent firings" expected on May 4. *Id.* at 1. The court granted a limited TRO preserving "the status quo as of the date" of its order to "prevent additional harm while allowing the Court to further consider the parties' briefing on the PI." *Id.* at 1-2.

The *Sonderling* opinion reinforces the conclusion that all of the preliminary injunction factors favor plaintiffs in this case. Although the *Sonderling* court issued a limited TRO, the court made clear that it did so merely as an interim measure to preserve the status quo while it considered the PI motion, given the likelihood of imminent firings anticipated on May 4 and the fact that it had held oral argument only one day earlier. *Id.* at 1-2. Nothing in that ruling suggests that the court believed the preliminary injunction—which remains under consideration—should be so

limited. And for the reasons set forth in the Plaintiffs States’ motion and reply, broad preliminary injunctive relief is necessary here to provide complete relief to the plaintiffs, who are suffering serious ongoing harm from the steps Defendants have already taken to implement the Closure Order and the Closure Decisions at IMLS, the Minority Business Development Agency, and the Federal Mediation and Conciliation Service.

Separately, as Defendants have noted (ECF No. 55), on May 1 the D.C. Circuit administratively stayed the district court’s preliminary injunction in *Widakuswara v. Lake*, No. 1:25-cv-1015-RCL (D.D.C. Apr. 22, 2025), solely to the extent that it required immediate disbursement of grant funds. The D.C. Circuit’s decision states that “[t]he purpose of this administrative stay is to give the court sufficient opportunity to consider the emergency motions for stay pending appeal *and should not be construed in any way as a ruling on the merits of those motions.*” *Widakuswara v. Lake*, No. 25-5144 (D.C. Cir. May 1, 2024) (emphasis added). By its terms, this decision makes clear that it reflects no view on the merits of the government’s motion for stay pending appeal. Further, and notably, the court declined the federal government’s request to grant a broad administrative stay of the district court’s order, and only paused the disbursement of funds that the federal government represented were due to be paid out imminently. Emergency Mot. For Administrative Stay and Partial Stay Pending Appeal at 2, 24, *Widakuswara v. Lake*, Nos. 25-5144, 25-514 (D.C. Cir. Apr. 25, 2025).

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I filed the within via the ECF filing system and that a copy is available for viewing and downloading. I have also caused a copy to be sent via the ECF System to counsel of record on this 2nd day of May 2025.

/s/ Paul T.J. Meosky